

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND (Baltimore)**

In Re:

Leonard C. Turner, Sr.
Angela M. Turner

Debtor

Case No. 19-22428
Chapter 13

Consumer Portfolio Services, Inc.

Movant

v.

Leonard C. Turner, Sr.
Angela M. Turner

Respondents

**FIRST DEFAULT OF CONSENT ORDER RESOLVING AUTOMATIC STAY
as to one (1) 2019 Nissan Altima Sedan VIN 1N4BL4CV2KC204966**

Movant Consumer Portfolio Services, Inc. (“CPS”), by its counsel, files this First Notice of Default of the Consent Order Resolving Relief from Automatic Stay as to one (1) 2019 Nissan Altima Sedan VIN 1N4BL4CV2KC204966 (ECF No. 81) and in support thereof states as follows:

1. The Consent Order Resolving Relief from Automatic Stay as to one (1) 2019 Nissan Altima Sedan VIN 1N4BL4CV2KC204966 required the Debtors to resume contract payment beginning on December 21, 2023, in the contractual monthly amount of \$512.43 until all payments under the Retail Installment Sale Contract -Simple Finance Charge (“Contract”) are remitted to satisfy the loan as well as cure post-petition arrears in the amount of \$538.00 (ECF No. 81).

2. The loan secured by the 2019 Nissan Altima Sedan VIN 1N4BL4CV2KC204966 is due for the May 2024 payment in the amount of \$510.58 plus payments for June and July 2024

in the amount of \$512.43 each for a total post-petition deficiency in the amount of \$1,535.44 and is therefore in default of the Consent Order in the same amount (Exhibit No. 1, Loan Summary).

3. Pursuant to the default terms of the Consent Order, the Debtor has until 08/08/2024 (10 days from 07/29/2024) to cure the deficiency amount of \$1,535.44 and remit that amount directly to Consumer Portfolio Services, Inc.

4. The Debtor must take one of the following actions within ten (10) days after the date of the filing of this Notice of Default:

- a. timely cure the default in the full amount of \$1,535.44; or,
- b. file an objection with the Court stating that no default exists and the basis thereof.

5. In the event that Debtor fails to take any of the above actions within the prescribed time period, Movant shall file an Affidavit of Default of the Consent Order that, upon its filing, terminates the Debtor's automatic stay as to one (1) 2019 Nissan Altima Sedan VIN 1N4BL4CV2KC204966 without any further notice or order of the Court.

6. Acceptance of partial payment by the Movant during the cure period shall not constitute a satisfaction or waiver of the default, and the automatic stay shall terminate on the expiration of the cure period in the absence of complete cure of the default, notwithstanding partial payment.

Date: 07/29/2024

Respectfully submitted,
/s/ Amy K. Kline
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of July 2024 a copy of the First Notice of Default of the Consent Order Resolving the Automatic Stay as to one (1) 2019 Nissan Altima Sedan VIN 1N4BL4CV2KC204966 was electronically served to the following individuals who are registered to receive such service:

Eric Steiner, Debtors' Counsel
info@steinerlawgroup.com

Rebecca A. Herr, Trustee
ecf@ch13md.com

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Brooklyn, MD 21225

Angela M. Turner
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/s/ Amy K. Kline
Amy K. Kline, 08382